

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RENITA CHALEPAH, as Personal)
Representative of the Estate of ZACHARY)
NICHOLAS BEAR HEELS for the benefit of)
the Heirs and Next of Kin as Personal)
Representative of the Estate of ZACHARY)
NICHOLAS BEAR HEES, deceased,)

Plaintiff,)

v.)

THE CITY OF OMAHA, a Municipal)
Corporation; SCOTTY PAYNE, in his)
Individual and official capacity: RYAN)
MCCLARTY, in his individual and official)
capacity; JENNIFER STRUDL, in her)
individual and official capacity; MAKYLA)
MEAD, in her individual and official capacity;)
and ERIK FOREHEAD, in his individual and)
official capacity.)

Defendants.)

CASE NO. 8:18CV381

**JOINT MOTION FOR
DISMISSAL**

COME NOW the parties, by and through their counsel of record, and jointly move the Court for an Order of Dismissal of the above-captioned matter in its entirety, with prejudice, with each party to pay its own attorney fees and costs.

WHEREFORE, the parties pray that the Court enter an Order of Dismissal with prejudice, each party paying its own attorney fees and costs and complete record waived.

Dated this 31st day of August, 2020

RENITA CHALEPAH, et al.,

THE CITY OMAHA, et al.,

Plaintiff,

Defendants,

By s/ Garvin Isaacs
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Debbie Maddox, OK Bar \$13166
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August, 2020, I electronically filed the foregoing **JOINT MOTION FOR DISMISSAL** with the Clerk of the Court using the CM/ECF system which is to send notification of such filing to all attorneys registered with the system who have entered an appearance in this action.

/s/ Michelle Peters